

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

SISTEM MÜHENDISLIK İNŞAAT SANAYİ
VE TİCARET, A.Ş.,

Plaintiff,

v.

THE KYRGYZ REPUBLIC,

Defendant.

No. 12 Civ. 4502 (ALC) (RLE)

**PLAINTIFF’S CROSS-MOTION
TO INCREASE SANCTIONS AND ENTER JUDGMENT**

Plaintiff Sistem Mühendislik İnşaat Sanayi Ve Ticaret, A.Ş. (“Sistem”) respectfully moves the Court to increase the civil contempt sanctions imposed on the Kyrgyz Republic (the “Republic”) pursuant to the Court’s October 31, 2018, order (Dkt. 185) from \$5,000 per day to \$10,000 per day; to enter judgment against the Republic on the unpaid fee awards and civil contempt sanctions accumulated to date; and to grant any other appropriate relief.

The grounds for this cross-motion are set forth in Sistem’s Memorandum of Law in Opposition to the Republic’s Motion To Vacate Contempt Sanctions and in Support of Sistem’s Cross-Motion To Increase Sanctions and Enter Judgment filed earlier today (Dkt. 191); in the accompanying Declarations of Robert K. Kry and Gürkan Yenice and the exhibits thereto (Dkts. 192 & 193), and in the evidence and other materials previously submitted in the case.

A proposed order and proposed judgment are attached.

Dated: August 8, 2019
New York, New York

Respectfully submitted,

/s/ Robert K. Kry

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